

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

<p>CORRIGENT CORPORATION,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>DELL TECHNOLOGIES INC. and DELL INC.,</p> <p style="text-align: center;">Defendants.</p>	<p>C.A. No. 22-496 (RGA)</p> <p><b>JURY TRIAL DEMANDED</b></p>
<p>CORRIGENT CORPORATION,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>ARISTA NETWORKS, INC.,</p> <p style="text-align: center;">Defendant.</p>	<p>C.A. No. 22-497 (RGA)</p> <p><b>JURY TRIAL DEMANDED</b></p>

**APPENDIX TO JOINT CLAIM CONSTRUCTION BRIEF**

**(VOLUME II OF II)**

ASHBY & GEDDES  
Andrew C. Mayo (#5207)  
500 Delaware Avenue, 8th Floor  
P.O. Box 1150  
Wilmington, DE 19899  
(302) 654-1888  
amayo@ashbygeddes.com

*Attorneys for Plaintiff*

MORRIS, NICHOLS, ARSHT & TUNNELL LLP  
Jack B. Blumenfeld (#1014)  
Jeremy A. Tigan (#5239)  
1201 North Market Street  
P.O. Box 1347  
Wilmington, DE 19899  
(302) 658-9200  
jblumenfeld@morrisnichols.com  
jtigan@morrisnichols.com

*Attorneys for Defendants  
Dell Technologies Inc. and Dell Inc.*

MORRIS, NICHOLS, ARSHT  
& TUNNELL LLP  
Jack B. Blumenfeld (#1014)  
Jennifer Ying (#5550)  
1201 North Market Street  
P.O. Box 1347  
Wilmington, DE 19899  
(302) 658-9200  
jblumenfeld@morrisnichols.com  
jying@morrisnichols.com

*Attorneys for Defendant Arista Networks, Inc.*

Dated: March 4, 2024

**TABLE OF EXHIBITS<sup>1</sup>**

<b>Exhibit</b>	<b>Description</b>
Ex. 1	Declaration of Andrew C. Mayo
Ex. 1A	Excerpt from the prosecution history for U.S. Patent No. 6,957,369, Response to Office Action, dated February 2, 2005
Ex. 1B	Excerpt from the prosecution history for U.S. Patent No. 6,957,369, Notice of Allowance, dated June 10, 2005
Ex. 1C	<i>Corrigent Corp. v. Cisco Sys. Inc.</i> , 6:22-cv-00396-ADA (W.D. Tex.), Dkt. 69 (March 21, 2023)
Ex. 1D	<i>Corrigent Corp. v. Cisco Sys. Inc.</i> , 6:22-cv-00396-ADA (W.D. Tex.), Dkt. 49 (December 16, 2022).
Ex. 2	Declaration of Dr. James Olivier in Support of Corrigent's Opening Claim Construction Brief, dated January 9, 2024
Ex. 2A	Curriculum Vitae of Dr. James Olivier
Ex. 2B	U.S. Patent No. 5,420,985
Ex. 2C	RFC4026, <i>Provider Provisioned Virtual Private Network (VPN) Terminology</i> , dated March 2005
Ex. 3	Declaration of Andrew C. Mayo
Ex. 3A	<i>Dell Technologies Inc. et al v. Corrigent Corporation</i> , IPR2023-00370, Petition, Paper 1, December 23, 2022
Ex. 3B	<i>Dell Technologies Inc. et al v. Corrigent Corporation</i> , IPR2023-00370, Exhibit 1003, Declaration of Dr. Bambos, December 23, 2022
Ex. 3C	<i>Arista Networks, Inc., v. Corrigent Corporation</i> , IPR2023-00805, Petition for IPR of the '400 Patent, Paper 2, April 3, 2023
Ex. 3D	<i>Arista Networks, Inc., v. Corrigent Corporation</i> , IPR2023-00805, Exhibit 1003, Declaration of Dr. Lavian, April 3, 2023
Ex. 3E	Excerpt of Ramesh Ponnappalli Deposition Transcript taken on October 11, 2023 in <i>Corrigent Corporation v. Cisco Systems, Inc.</i> , 6:22-cv-00396 (W.D. Tex.)
Ex. 4	Supplemental Declaration of Dr. James Olivier Regarding Claim Construction, dated February 22, 2024
Ex. 4A	IEEE Std 802.1Q-1998, Virtual Bridged Local Area Networks
Ex. 4B	Lasserre et al. Virtual Private LAN Services over MPLS, IETF draft-ietf-12vpn-vpls-1dp-08.txt, November 2005

---

<sup>1</sup> Plaintiff's exhibits listed first, followed by Defendants' exhibits.

Exhibit	Description
Ex. 4C	DeCusatis, Fiber Optic Data Communication Technological Trends and Advances, Academic Press, 2002
Ex. 4D	RCA Engineer, Vol. 30, No. 1, Jan./Feb. 1985
Ex. 4E	Excerpt of Leon Bruckman Deposition Transcript taken on November 2, 2023 in <i>Corrigent Corporation v. Cisco Systems, Inc.</i> , 6:22-cv-00396 (W.D. Tex.)
Ex. 4F	IEEE Std. 896.1-1991, <i>IEEE Standard for Futurebus+ - Logical Protocol Specification</i> , September 26, 1991
A	Rebuttal Declaration of Dr. William R. Michalson (“Michalson ”)
B	<i>Idle, Subsidiary</i> , Collins English Dictionary, Harper Collins (5th ed. 2000)
C	<i>Idle, Subsidiary</i> , Random House Webster’s Unabridged Dictionary (2d ed. 2001)
D	<i>Subsidiary</i> , Funk & Wagnalls New Int’l Dictionary of the English Language (2000)
E	<i>Corrigent Corp. v. Cisco Sys., Inc.</i> , No. 6:22-cv-00369-ADA, Dkt. 69 (W.D. Tex. Mar. 21, 2023)
F	<i>Back</i> , The American Heritage Dictionary of the English Language (4th ed. 2000)
G	<i>Back</i> , Oxford English Dictionary (2023), available at <a href="https://www.oed.com/dictionary/back_adv?tab=meaning_and_use#30512240">https://www.oed.com/dictionary/back_adv?tab=meaning_and_use#30512240</a>
H	<i>Backplane</i> , The Authoritative Dictionary of IEEE Standards Terms (7th ed. 2000)
I	<i>Backplane</i> , Novell’s Complete Encyclopedia of Networking (1st ed. 1995)
J	Supplemental Rebuttal Declaration of Dr. William Michalson, dated February 29, 2024